

I respectfully submit the following comments regarding the Localism Notice of Proposed Rulemaking, released January 24, 2008 in MB Docket No. 04-233.

I strongly urge the commission not to adopt the proposed rules, procedures or policies discussed in this NPRM. As a non-commercial broadcaster, I am very concerned that any policy that requires a station to employ someone to baby-sit such sophisticated automation equipment would cause a serious, unnecessary drain on precious, limited resources. The consequences could force stations to reduce hours of operation, or re-direct resources from other important services such as local news production, live remotes, and live on-air operators. Worst-case scenario would be that some stations would go silent altogether. The losers will ultimately be the communities we serve.

Regarding the proposal to require stations to form an advisory board comprised of various local representatives, I am very concerned that this would be in violation of the first amendment by forcing religious broadcasters to air content that is in opposition to their core values, mission, and religious convictions. In a free-market system, the customer ultimately determines the needs. Our listeners support our station because we meet their needs. Listeners support other stations because they meet their needs. It is, and always should be, the listeners who determine if a broadcast station is meeting their needs by patronizing our sponsors and supporting our fund drives.

Regarding the proposal to grant a certain amount of airtime to groups who request it, this too, would be a violation of the first amendment. As religious broadcasters, we have made large investments in our operations in order to spread the gospel of Jesus Christ and how He can change lives. To allow groups who do not share our values and mission to use our resources is the same as the government telling a religious broadcaster what they must broadcast. If a group of individuals wishes to promote its message or agenda, they can purchase time on other radio stations that don't oppose their views, purchase newspaper and magazine space, buy television spots, or even go to the extent of investing in their own broadcast or print media operation, just like we, the religious broadcasters of America have done.

From a common sense perspective, it doesn't even make good logic to compel a broadcaster to air material that is not congruent with the likes and convictions of its audience. Neither does it make sense to have individuals who do not necessarily share the same mission of a broadcaster to determine what their audience wants to hear. The result would be that every radio station would sound the same and diversity would be lost.

In conclusion, I implore the Commission to dismiss these proposals in their entirety and allow the common sense that drives a free market to prevail.

Now, if you will excuse me, I must go write a letter to the FTC to insist that they force my local McDonalds to also sell Whoppers, because our little community does not have local access to Whoppers.

Cordially,
Brian S. Benedict
Clyde Educational Broadcasting Foundation